

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case File No. 15-CR-49 (MJD/FLN)

United States of America,

Plaintiff,

v.

Zacharia Yusuf Abdurahman,

Defendant.

**DEFENDANT ZACHARIA YUSUF
ABDURAHMAN'S MOTION FOR
DOWNWARD VARIANCE**

The Defendant, Zacharia Yusuf Abdurahman, through his undersigned counsel, respectfully moves this Court for a downward variance.

This motion is made on all the files and records in the case, the Defendant's Individual Position Regarding Sentencing, the Defendants' Joint Defense Sentencing Memorandum, the United States Sentencing Guidelines, and upon such other and further points and authorities as may be presented to the Court.

Respectfully submitted,

Dated: November 3, 2016

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